

UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA

ROBERTA J. HESS *ex rel.*) Case No. 8:17-cv-00340-LSC-SMB
UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.) DEFENDANT'S MOTION FOR
) SUMMARY JUDGMENT
THE NEBRASKA MEDICAL CENTER,)
a Nebraska nonprofit corporation,)
)
 Defendant.)

COMES NOW Defendant The Nebraska Medical Center, (hereinafter "Defendant"), and, pursuant to Fed R. Civ. P. 56 and LR 56.1(a), hereby moves the Court for an Order granting summary judgment in favor of Defendant with respect to all claims and causes of action set forth in Plaintiff's Complaint and Jury Demand. In support of its motion, Defendant states as follows:

1. On September 19, 2017, Plaintiff filed a Complaint against Defendant in the United States District Court for the District of Nebraska. (ECF No. 1). Thereafter, on October 26, 2017, Plaintiff filed an Amended Complaint. (ECF No. 3).
2. In her Amended Complaint, Plaintiff alleges that she was subjected to sex and age discrimination. She also alleges Defendant defamed her by stating that she was terminated for forging a physician's signature.
3. The evidence demonstrates that there is no genuine issue of material fact and that Defendant is entitled to judgment as a matter of law on Plaintiff's claims.
4. In support of its Motion for Summary Judgment, Defendant relies on the pleadings on file in this matter, Defendant's Statement of Undisputed Material Facts and evidentiary materials filed therewith, and Defendant's Brief in Support of Motion for Summary Judgment which are all incorporated by reference and submitted in conjunction with this Motion.

WHEREFORE Defendant The Nebraska Medical Center respectfully requests the Court grant its Motion for Summary Judgment on all claims in Plaintiff's Amended Complaint, dismiss Plaintiff's Amended Complaint with prejudice, and grant such other relief as the Court deems appropriate.

Dated this 4th day of February, 2019.

THE NEBRASKA MEDICAL CENTER,
Defendant

By: /s/ Jessica Källström-Schreckengost
Sarah J. Millsap, #23840
Jessica Källström-Schreckengost, #25638
JACKSON LEWIS P.C.
10050 Regency Circle, Suite 400
Omaha, Ne 68114
Telephone: (402) 391-1991
Facsimile: (402) 391-7363
Email: sarah.millsap@jacksonlewis.com
Email: jessica.kallstrom-schreckengost@jacksonlewis.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 4th day of February, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM-ECF system which sent notification of such filing to all counsel of record.

/s/ Jessica Källström-Schreckengost
Jessica Källström-Schreckengost